

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5500

Rachel Perillo

April 14, 2020

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above referenced matter. Due to certain limitations posed by the present COVID-19 pandemic, and the ongoing discovery production in this case, I write with the consent of the attorney for the government, Dina McCleod, respectfully seeking an extension of the current motion deadlines and an adjournment of the status conference that is presently scheduled for May 11, 2020.

The discovery that has already been produced in this case is massive, and I have not yet had sufficient time to review it in light of the present circumstances. The government has also informed me that it will be producing two additional phone extractions. Additionally, the defendant has neither reviewed nor received the discovery already produced. As the Court is aware, legal visiting at the Metropolitan Correctional Center, where Mr. Raji is in custody, is currently suspended. Some of the discovery materials are subject to a protective order and cannot be viewed outside the presence of counsel. Accordingly, additional time is needed to review the discovery and to ensure that Mr. Raji has reviewed it as well.

The Court has set the following motion schedule: Motions due by May 8, 2020, Oppositions due by May 22, 2020, and Replies due by May 29, 2020. Because additional time is needed to review discovery and determine whether the defendant will be making motions, I respectfully request an extension of the Court's deadlines to the following proposed dates:

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Motions Due: June 26, 2020

Oppositions Due: July 10, 2020

Replies Due: July 17, 2020

Additionally, for the same reasons discussed above, I respectfully request an adjournment of the May 11th status conference and propose an adjournment date of June 20, 2020. The defendant consents to the exclusion of speedy trial time.

If the Court has any questions regarding this application please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: Dina McCleod (by ECF)
Assistant United States Attorney